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August 3, 2020

Via ECF

Hon. Philip M. Halpern
United States District Court
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

***RE: Mid-Hudson Properties, Inc. v Liberty Mutual Insurance Co. &
The Netherlands Insurance Co.
Civ. Action No. 7:19-cv-01167***

Dear Judge Halpern:

This firm represents the Defendants Liberty Mutual Insurance Company and The Netherlands Insurance Company ("Defendants") in the above-referenced matter. We write jointly with counsel for Plaintiff Mid-Hudson Properties, Inc. ("Plaintiff") pursuant to Your Honor's memorandum endorsement dated July 24, 2020 (Doc. #20) to Mr. Dweck's July 23, 2020 letter to the Court with respect to discovery issues (Doc. #19).

Defendants have served responses to Plaintiff's interrogatories and document production requests, together with a more than 1,400-page document production. We have also provided Mr. Dweck with a detailed deficiency letter concerning Plaintiff's answers to Defendants' interrogatories and responses to Defendants' requests for production. Counsel have had two telephone conversations regarding these matters, but Mr. Dweck has advised that he needs additional time to review Defendants' document production and discovery responses, and the deficiency letter received from Defendants, before he can engage in a more productive discussion in an attempt to resolve the parties' discovery disputes.

In these circumstances, the parties respectfully request that the Court delay for a period of two weeks the August 6, 2020 telephone conference and, if the discovery issues between the

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parties cannot be resolved, establish a commensurate deadline before the conference for letter submissions to Your Honor outlining the remaining issues in dispute.

Thank you for the Court's consideration.

Respectfully submitted,

/s/ Robert M. Wolf

ROBERT M. WOLF

cc: Jack S. Dweck, Esq. (by email and ECF)
Rachel R. Hager, Esq.

The status conference scheduled for August 6, 2020 is adjourned until August 20, 2020 at 3:00 p.m. By August 18, 2020 the parties shall submit a joint letter (not to exceed five pages) either notifying the Court that the parties' discovery disputes have been resolved or providing the parties' position on all outstanding disputes. If a conference is necessary, at the time of the scheduled conference all parties shall call (888) 398-2342; access code: 3456831.

SO ORDERED.


Philip M. Halpern, U.S.D.J.

Dated: New York, NY
August 4, 2020